

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

MARY L. CLINTON,)
Plaintiff,) CIVIL ACTION
v.)
SECURITY ASSET CAPITAL)
CORPORATION, *et al.*,) NO. 02-CV-2982
Defendants.)

REQUEST FOR ENTRY OF DEFAULT AS TO DEFENDANTS LANCASTER
ANNUITY SERVICES COMPANY, GARY SPIRK ENTERPRISES AND SECURE
INVESTMENT, INC.

To: Clerk

Defendants, Lancaster Annuity Services Company, Gary Spirk Enterprises and Secure Investment, Inc., having failed to answer or otherwise appear in the above-entitled action, and the time for appearance having expired, you are requested to enter defendants' default pursuant to Rule 55(a) of the Federal Rules of Civil Procedure.

Respectfully Submitted,
CLYMER & MUSSER, P.C.

/s/ Leonard G. Brown, III
Leonard G. Brown, III, Esquire
Attorney for Plaintiff
23 North Lime Street
Lancaster PA 17602-2912
(717) 299-7101
I.D. #83207

Dated: November 3, 2004

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FOR THE EASTERN DISTRICT OF PENNSYLVANIA

MARY L. CLINTON,) CIVIL ACTION
Plaintiff,)
v.) NO. 02-CV-2982
SECURITY ASSET CAPITAL)
CORPORATION, *et al.*,)
Defendants.) JURY TRIAL DEMANDED

Affidavit

I, Leonard G. Brown, III, say:

1. I am the attorney for plaintiffs in the above action.
2. A copy of the summons and complaint was served on defendants Lancaster Annuity Services Company on June 25, 2002, Gary Spirk Enterprises on June 25, 2002 and Secure Investment, Inc. on June 25, 2002, as provided in docket entry number two.
3. Defendants Lancaster Annuity Services Company, Gary Spirk Enterprises and Secure Investment, Inc have not answered or otherwise appeared in this action, and the time within which defendants may appear has expired.

/s/ Leonard G. Brown, III
Leonard G. Brown, III, Esquire
Attorney for Plaintiffs

Date: November 3, 2004